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NCH CORPORATION
Environmental and Regulatory Affairs Department

May 8, 1989

Acumenics Research
& Technology, Inc.
1400 I Street, N.W.
Suite 200
Washington, DC 20005

Attention: 104(e) Task

Re: KEM Manufacturing
Artel Chemical Site
EPA CERCLA 104(e) Request

Gentlemen:

NCH Corporation has received the referenced request dated April 20, 1989, regarding releases and/or threatened releases alleged to have taken place at the Artel Chemical Site (also Fike and/or Roberts Chemical) in Nitro, West Virginia. By agreement dated December 9, 1986, NCH Corporation and its wholly owned subsidiary KEM Acquisition, Inc. acquired certain assets of KEM Manufacturing Corporation from its parent Crompton & Knowles Corporation. NCH Corporation did not acquire the entity KEM Manufacturing nor its stock and conducted no manufacturing operations from the Tucker, Georgia, facility. Subsequently, the name of KEM Acquisition, Inc. was changed to Systems General, Inc. and the business of KEM Manufacturing now operates as a sales division of Systems General, Inc.

Pursuant to certain provisions of the Asset Purchase Agreement, Crompton & Knowles Corporation agreed to defend and indemnify NCH Corporation against any claims made by third parties arising out of the operations of the Tucker, Georgia, facility prior to the Closing Date of the Agreement (December 19, 1986). Accordingly, NCH Corporation has forwarded the request to Crompton & Knowles. A copy of that forwarding notice is enclosed.

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If there are any questions or you need further information, please
let me know.

Sincerely,



Deborah A. Chadbourne

Enclosures

cc: Charles Marsden, Crompton & Knowles
Joe Cleveland, NCH Corporation
James Heenehan, EPA Office of Regional Counsel

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